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14
15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**
18

19 OWEN DIAZ,

20 Plaintiff,

21 v.

22 TESLA, INC. d/b/a TESLA MOTORS, INC.,

23 Defendant.
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27
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Case No. 3:17-cv-06748-WHO

**DEFENDANT TESLA, INC.'S NOTICE
OF SUBMISSION OF PROPOSED
REVISED DRAFT PRELIMINARY JURY
INSTRUCTIONS**

Judge: Hon. William H. Orrick

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Please take notice that, in response to the Court's request made at the Final Pretrial
 3 Conference on February 27, 2023, Defendant Tesla, Inc. ("Tesla") hereby submits as **Exhibit A**
 4 hereto its proposed revisions to the Draft Preliminary Jury Instructions prepared by the Court and
 5 provided to the parties on February 24, 2023. Tesla submits its attached proposed revisions subject
 6 to and without waiving its previously asserted objections to, or requests for, jury instructions,
 7 including as contained in the parties' Joint Proposed and Disputed Jury Instructions (Dkt. 389).

8
 9 DATED: February 28, 2023

By: /s/ Daniel C. Posner

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